

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION

CASE NO. 22-61477-CIV-SINGHAL/VALLE

DEVIN GRANDIS, an individual, and  
ADVANCED POWER TECHNOLOGIES,  
LLC, a Florida limited liability company

Plaintiffs,

v.

BGIS GLOBAL INTEGRATED SOLUTIONS  
US LLC, a Washington limited liability  
company, and BIFM JERSEY TOPCO  
LIMITED, a Jersey limited liability company,

Defendants.

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**PLAINTIFF, DEVIN GRANDIS' RESPONSES TO DEFENDANT BGIS GLOBAL  
INTEGRATED SOLUTIONS US LLC'S REQUEST FOR ADMISSIONS**

Plaintiff, DEVIN GRANDIS, by and through his undersigned counsel and pursuant to Rule 36 of the Federal Rules of Civil Procedure, hereby serves his Responses to Defendant's Request for Admissions and states:

**RFA NO. 1.** Admit that, during Your employment with BGIS, BGIS directed You to complete online sensitivity or harassment training.

**ANSWER:** BGIS directed me to complete online courses in a letter by Mark Marquis dated March 7, 2023, which letter stated that "Ron Shory will assign . . . online learning courses that you will be required to complete surrounding the topics of workplace civility behaviors and gender bias." On March 23, 2022, Ibrahim Bhayat sent me a link to "percipio.com," with the five courses that I was to complete. However, I do not remember any mention by anyone of online learning courses

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about “sensitivity or harassment training,” as is stated in this Request for Admission No. 1. Thus, I deny this request.

**RFA NO. 2.** Admit that You did not complete the online sensitivity or harassment training BGIS directed You to complete.

**ANSWER:** While I do not remember the exact names of the five courses assigned to me at percipio.com, each course assigned to me, in fact, was completed, before I was suspended. Thus, this Request for Admission No. 2 is denied.

**RFA NO. 3.** Admit that, during a trade show between March 14, 2022 and March 16, 2022, You said to BGIS employee Nikki Sakkoff [sic], that if she kept bending over like that with her ass out, she was bound to get attacked or raped.

**ANSWER:** Denied.

**RFA NO. 4.** Admit that, during a trade show between March 14, 2022 and March 16, 2022, You asked BGIS employee Nikki Sakkoff [sic] if she would say anything if she went camping and woke up with a condom in her ass.

**ANSWER:** Denied.

**RFA NO. 5.** Admit that, after making the statement to Nikki Sakkoff [sic] described in RFA NO. 4, You asked her if she wanted to go camping with You.

**ANSWER:** Denied.

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**RFA NO. 6.** Admit that, during a discussion with Brian Fellows, BGIS's Chief Operating Officer, when asked to describe what services Rebekah Nicholas provided for BGIS, You replied "she swallows."

**ANSWER:** Admitted.

**RFA NO. 7.** Admit that, prior to Your termination, BGIS used the facsimile stamp as part of the day-to-day operations of the company.

**ANSWER:** Admitted.

**RFA NO. 8.** Admit that You have incurred no monetary damages caused by BGIS's use of the facsimile stamp after Your termination from BGIS.

**ANSWER:** Denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 16<sup>th</sup> day of August, 2023 a true and correct copy of the original of this document was submitted through electronic mail for filing and service upon the attorneys of record who are listed below.

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